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Attorney for Defendant
Cody. Cramer

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-00155-JAM
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE AND EXCLUDE TIME
JOSHUA WILSON and) Date: June 4, 2024
CODY CRAMER,) Time: 9:00 a.m.
Defendants.) Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for June 4, 2024, at 9:00 be continued to **August 20, 2024, at 9:00 a.m.**

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on June 4, 2024, at 9:00 a.m.
2. By stipulation, Mr. Cramer now moves to continue the status conference to August 20, 2024, at 9:00 a.m.
3. To date, the government has produced approximately 850 pages and various audio/video recordings of discovery to the defendants.
4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,

investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.

5. Counsel for Mr. Wilson and Mr. Cramer have trials in other jurisdictions set in June that have necessitated a great deal of preparation time.
6. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
7. Neither the government nor Mr. Wilson object to the continuance.
8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between June 4, 2024 and August 20, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: May 28, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

Date: May 28, 2024

/s/ Kyle Knapp
Kyle Knapp
Attorney for Mr. Cramer

Date: May 28, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ James R. Conolly
James R. Conolly
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: May 30, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE